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GOOGLE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, *et al.* individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**[PROPOSED] ORDER GRANTING  
GOOGLE LLC'S MOTION TO  
EXCLUDE PLAINTIFFS' EXPERT  
OPINION OF BRUCE SCHNEIER**

Date: May 15, 2025

Time: 1:30 p.m.

Ctrm: 3 - 17th Floor

Judge: Hon. Richard Seeborg

Action filed: July 14, 2020

Trial Date: August 18, 2025

**[PROPOSED] ORDER**

Before the Court is Defendant Google LLC's ("Google") Motion to Exclude Plaintiffs' Expert Opinion of Bruce Schneier ("Mr. Schneier") and documents filed in connection with that motion.

Having considered the Notice of Motion and Motion to Strike Plaintiffs' Expert's Opinion, the incorporated Memorandum of Points and Authorities, the Declaration of Eduardo E. Santacana filed concurrently therewith, and the exhibits attached thereto, along with other materials in the record, argument of counsel, and such other matters as the Court may consider, the Court GRANTS Google's Motion.

Accordingly, IT IS HEREBY ORDERED THAT:

The opinions of Plaintiffs' expert Bruce Schneier in his Report submitted February 20, 2023 ("2023 Report") are hereby excluded, except for those opinions embodied in paragraphs 209–221, 296–310, and 268–278; and Mr. Schneier's Supplemental Expert Report, submitted on January 6, 2025, is excluded in its entirety. Mr. Schneier is excluded from testifying at the trial of this action, except as to paragraphs 209–221, 296–310, and 268–278 of the 2023 Report.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Honorable Richard Seeborg  
United States District Judge